

1 KILPATRICK TOWNSEND & STOCKTON LLP
2 STEVEN D. MOORE (Bar No. 290875)
smoore@kilpatricktownsend.com
3 MEHRNAZ BOROUMAND SMITH (Bar No. 197271)
mboroumand@kilpatricktownsend.com
4 DARIUS C. SAMEROTTE (Bar No. 296252)
dsamerotte@kilpatricktownsend.com
Two Embarcadero Center, Suite 1900
5 San Francisco, CA 94111
Telephone: 415 576 0200
6 Facsimile: 415 576 0300

7 Attorneys for Plaintiff
8 GOPRO, INC.

9 MORRISON & FOERSTER LLP
MICHAEL A. JACOBS (CA SBN 111664)
10 MJacobs@mofo.com
NATHAN B. SABRI (CA SBN 252216)
11 NSabri@mofo.com
ESTHER KIM CHANG (CA SBN 258024)
12 EChang@mofo.com
425 Market Street
13 San Francisco, California 94105-2482
Telephone: (415) 268-7000
14 Facsimile: (415) 268-7522

15 Attorneys for Defendants
C&A Marketing, Inc.; C&A Licensing, LLC;
16 and PLR IP Holdings, LLC

17 **UNITED STATES DISTRICT COURT**

18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 **SAN FRANCISCO DIVISION**

20 GOPRO, INC.

Case No. 3:16-cv-03590-JST

21 Plaintiff,

22 v.

23 C&A MARKETING, INC., C&A
LICENSING, LLC, AND PLR IP
24 HOLDINGS, LLC,

25 Defendants.

26 **STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
DEFENDANTS TO FILE OPPOSITION
TO PLAINTIFF'S MOTION FOR LEAVE
TO FILE AN AMENDED COMPLAINT
(DKT. NO. 39)**

27 Complaint Filed: June 27, 2016

28 **AND RELATED COUNTERCLAIMS**

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME
Case No. 3:16-cv-03590-JST

1 Pursuant to Local Rule 6-1(b), Plaintiff GoPro, Inc. (“GoPro”) and Defendants C&A
2 Marketing, Inc.; C&A Licensing, LLC; and PLR IP Holdings, LLC (“Defendants”) hereby
3 stipulate as follows:

4 WHEREAS, on April 14, 2017, GoPro moved for leave to file an amended complaint
5 (Dkt. No. 39);

6 WHEREAS, the parties are discussing a resolution that would avoid further motion
7 practice related to Dkt. No. 39;

8 WHEREAS, the parties have not yet completed these discussions but nevertheless wish to
9 avoid unnecessary briefing, if possible;

10 WHEREAS, Defendants’ opposition is currently due on April 28, 2017, GoPro’s reply is
11 due May 5, 2017, and the hearing is not set until June 15, 2017, thus providing sufficient time to
12 adjust the briefing schedule while maintaining at least fourteen days between GoPro’s reply brief
13 and the hearing;

14 IT IS HEREBY STIPULATED AND AGREED that the time by which Defendants may
15 file an opposition to GoPro’s Motion for Leave to File an Amended Complaint (Dkt. No. 39) is
16 extended one week from April 28, 2017 to May 5, 2017;

17 IT IS FURTHER STIPULATED AND AGREED that the time by which GoPro shall
18 reply to Defendants’ responses to GoPro’s Motion for Leave to File an Amended Complaint (Dkt.
19 No. 39) is extended one week from May 5, 2017 to May 12, 2017.

20 The parties previously stipulated to extend time to respond to the Complaint, to continue
21 the initial case management conference, to serve invalidity contentions and exchange preliminary
22 claim constructions, and to serve damages contentions and responsive damages contentions. This
23 extension will not otherwise affect the schedule for the case.

24 ///

25 ///

26 ///

27 ///

28 ///

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME
Case No. 3:16-cv-03590-JST

1 Dated: April 28, 2017

Dated: April 28, 2017

2 KILPATRICK TOWNSEND & STOCKTON LLP

MORRISON & FOERSTER LLP

3
4 /s/ Mehrnaz Boroumand Smith
MEHRNAZ BOROUMAND

/s/ Nathan B. Sabri
NATHAN B. SABRI

5 Attorneys for Plaintiff GoPro, Inc.

6 Attorneys for Defendants C&A
7 Marketing, Inc.; C&A Licensing, LLC;
and PLR IP Holdings, LLC

8

9 **ATTESTATION OF E-FILED SIGNATURE**

10 I, Mehrnaz Boroumand Smith, am the ECF User whose ID and password are being used to
11 file this **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR**
12 **DEFENDANTS TO FILE OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO**
13 **FILE AN AMENDED COMPLAINT (DKT. NO. 39).** In compliance with Local Rule 5-
14 1(i)(3), I hereby attest that Nathan B. Sabri has concurred in this filing.

15
16 Dated: April 28, 2017

/s/ Mehrnaz Boroumand Smith
Mehrnaz Boroumand Smith

17
18
19 Dated: May 1, 2017


Honorable Jon S. Tigar
United States District Judge

20
21
22
23
24
25
26
27
28 69318632V.1

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME
Case No. 3:16-cv-03590-JST